

GIBSON, DUNN & CRUTCHER LLP

Orin Snyder (*pro hac vice*)  
osnyder@gibsondunn.com

200 Park Avenue  
New York, NY 10166-0193  
Telephone: 212.351.4000  
Facsimile: 212.351.4035

Kristin A. Linsley (SBN 154148)  
klinsley@gibsondunn.com  
Martie Kutscher (SBN 302650)  
mkutscherclark@gibsondunn.com  
555 Mission Street, Suite 3000  
San Francisco, CA 94105-0921  
Telephone: 415.393.8200  
Facsimile: 415.393.8306

GIBSON, DUNN & CRUTCHER LLP

Joshua S. Lipshutz (SBN 242557)  
jlipshutz@gibsondunn.com

1050 Connecticut Avenue, N.W.  
Washington, DC 20036-5306  
Telephone: 202.955.8500  
Facsimile: 202.467.0539

Deborah Stein (SBN 224570)  
dstein@gibsondunn.com  
333 South Grand Avenue  
Los Angeles, CA 90071-3197  
Telephone: 213.229.7164  
Facsimile: 213.229.6164

*Attorneys for Defendant Facebook, Inc.*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: FACEBOOK, INC. CONSUMER  
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

~~[PROPOSED]~~ ORDER GRANTING  
FACEBOOK'S ADMINISTRATIVE  
MOTION TO SEAL

**[PROPOSED] ORDER**

The Court has considered Facebook, Inc.'s Administrative Motion to Seal ("Facebook's Motion"), and the evidence offered in support of Facebook's Motion, including the Declaration of Martie Kutscher In Support Of Facebook's Administrative Motion to Seal ("Kutscher Declaration"). Good cause having been shown, Facebook, Inc.'s Administrative Motion to File Under Seal is GRANTED.

The Court hereby ORDERS:

1. Facebook's Corrected Request to Approve Facebook's Search String Proposal for Custodian Groups 1-4 shall be permanently redacted as reflected on Exhibit 1 to the Kutscher Declaration;
2. The unredacted version of Facebook's Corrected Request to Approve Facebook's Search String Proposal for Custodian Groups 1-4 (Kutscher Declaration, Exhibit 2) shall be permanently sealed; and
3. Kutscher Declaration, Exhibits 3, 4, and 5, which are the unredacted versions of Exhibits A, B, and C to the Declaration of Martie Kutscher In Support Of Facebook's Corrected Request to Approve Facebook's Search String Proposal for Custodian Groups 1-4, shall be permanently sealed.

**IT IS SO ORDERED.**

DATE: March 15, 2021

